

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RANDELL HAMPTON,

Plaintiff,

vs.

HENRY PERKINS.

Defendant.

Civil Action Number
2:06-CV-400-MHT

DEFENDANT'S REQUESTED JURY VOIR DIRE

Comes now the Defendant, by and through the undersigned counsel, and submits the following requested jury voir dire questions:

KNOWLEDGE OF PARTIES AND ATTORNEY

1. The Plaintiff, Randall Hampton, is an inmate confined within the Alabama Department of Corrections. Are any of you acquainted, even slightly, with the Plaintiff in this case or his immediate family?
2. The Defendant in this case is Henry Perkins, a Captain at the Bullock Correctional Facility at the time of this incident. Does any prospective juror know this Defendant or his immediate family?
3. The Defendant is represented by Al Butler, Assistant General Counsel, with the Department of Corrections. Does any prospective juror know Mr. Butler or his immediate family?

RELATIONSHIP WITH PROSPECTIVE WITNESSES

4. Erric Demus, Joseph Fitzpatrick, and LaSonja Haynes, who are all employed with the Alabama Department of Corrections, may be witnesses in this case. Does any juror know any of these witnesses?

CONNECTION WITH LAW ENFORCEMENT AGENCIES

5. Have you, or any member of your immediate family, ever been employed by:

- (a) The United States Department of Justice;
- (b) Any federal, state or local prosecutor's office;
- (c) The Federal Bureau of Investigation;
- (d) Any federal law enforcement agency;
- (e) The United States Postal Service;
- (f) Any local sheriff's department;
- (g) The Drug Enforcement Administration;
- (h) Any local police department;
- (i) The Alabama Department of Corrections; or
- (j) ever been a member of the armed forces?

6. Has any member of the jury venire ever received training in the law enforcement field including getting someone medical treatment?

JURY EXPERIENCE

7. Have any of you ever served on a jury in a civil case which returned a verdict of money damages against the defendant?

ORGANIZATIONAL ACTIVITIES

8. Is any member of the jury venire a member of any inmates' rights organization or group? If so, please name the organization.

GENERAL

9. Does any member of jury venire have a relative or friend incarcerated in prison? If so, please explain.

10. Has any member of the jury venire ever filed a complaint with any agency regarding the conduct of a law enforcement officer? If so, please explain.

11. Is there any member of the jury venire that has a fixed opinion as to how the Alabama Department of Corrections treats convicts now in prison, whether the Alabama Department of Corrections treats them too harshly or too leniently? If so, please explain.

12. Does any member of this jury venire have a prejudice against the State of Alabama or the Alabama Department of Corrections? If so, please explain.

13. Has any member of the jury ever visited a convict in an Alabama prison?

14. Do any of you have any reason why you should not serve as a member of this jury or feel in the slightest way some reluctance about your possible services as member of this jury?

15. Does any member of the jury have a close family member who suffers from a mental illness?

Respectfully submitted,

Kim T. Thomas (THO115)
Deputy Attorney General
General Counsel

/s/Albert S. Butler
Albert S. Butler (BUT016)
Assistant General Counsel
Assistant Attorney General

ADDRESS OF COUNSEL:

Alabama Department of Corrections
Legal Division
301 South Ripley Street
Post Office Box 301501
Montgomery, Alabama 36130-1501
334-353-4859

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing documents upon:

Inmate Randell Hampton, AIS # 226420
Kilby Correctional Facility
P. O. Box 150
Mt Meigs, AL 36057

by placing a copy of same in the U.S. Mail, properly addressed and postage paid, on this the 12th
day of June, 2008.

/s/Albert S. Butler
Albert S. Butler (BUT016)
Assistant General Counsel
Assistant Attorney General